

Alan



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, Washington 98101

January 19, 1995

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Reply to
Attn of: HW-124

JAN 24 1995

Program Manager

Ms. Lisa Green, Manager
Environmental Restoration Program
U.S. Department of Energy
Idaho Operations Office
850 Energy Drive
Idaho Falls, Idaho 83401

Re: The Scope of Work for Operable Units 4-03, 4-07 and 4-09,
Track 2 Investigations at the Central Facilities Area, INEL

Dear Ms. Green:

We have reviewed the referenced document and have a few
comments, which are enclosed.

This Scope of Work generally reflects the discussions at the
scoping meeting held on December 5, 1994, and should provide a
good basis for developing the Sampling and Analysis Plan.

If you or your staff have questions or concerns with any
of these comments, please contact me at (206) 553-1172.

Sincerely,

Howard R. Blood
Howard R. Blood
WAG 4 Project Manager

Enclosure

cc: Alan Dudziak, DOE-ID
Shawn Rosenberger, IDHW-IF
Dean Nygard, IDHW

cc w/o encl: Jerry Lyle, DOE-ID
Carol Strong, LITCO

01/19/95:HRB
OU4-09 T2SOW CMT.LTR

bcc: EPA/Wayne Pierre
EPA/Branch File

REVIEW COMMENTS
SCOPE OF WORK FOR OPERABLE UNITS 4-03, 4-07 AND 4-09
TRACK 2 INVESTIGATIONS AT THE CENTRAL FACILITIES AREA, INEL

GENERAL COMMENTS

1. These comments are from a review of the Scope of Work, Revision 0, dated 12/14/1994, which was received by EPA on December 20, 1994.
2. The identification of three OUs in the project title is potentially confusing. CFA-45 has been evaluated as a Track 1 site under OU4-03, but is being evaluated as a Track 2 site in OU4-09. It would be clearer if it was just identified as being in OU4-09. Since all sites in OU4-07 are now being evaluated as Track 2 sites, it may be acceptable for them to retain their identity as an OU, but the project files (administrative record) needs to clearly show how the sites went from Track 1 to Track 2.
3. The SOW generally conforms with decisions reached during the December 5, 1994 scoping meeting, but some points need to be clarified before the Sampling and Analysis Plan is developed, as outlined in the specific comments below.

SPECIFIC COMMENTS

1. Section 2.1: It is unclear why the range of "elevated TPH concentrations" is not provided in the third paragraph.
At this point, the results of the Track 1 are also part of the site history, and would help clarify why the site is included in this SOW.
2. Section 3: The Chemical Washout Area should be routinely included when discussing CFA-07. The last sentence in this Section should be expanded to include the reason for the decision.
3. Section 4.2: In Section 2.2, pesticides were identified as being disposed of in these French Drains, but they are not identified as COCs. The rationale for this decision should be included.
4. Section 4.3: It is unclear why the paragraph about CFA-42 includes statements about "additional characterization at CFA-26".
5. Section 7: The schedules will need to be adjusted to reflect actual dates, but slippage needs to be kept to a minimum to ensure the field work can be completed in FY95.
6. Conceptual Site Models: The models need present information in a consistent way, or include notes to explain differences. For example, the CFA-10 model shows no "Exposure Route" or "Receptor" for "Volatilization", but does show them for "Nuclear Decay". However, both of these Release Mechanisms are shown as having broken pathways. Nuclear Decay is also shown as a broken pathway for CFA-42, CFA 26, CFA-45 and CFA-46, but the "External Exposure" Exposure Route is carried through the model until shown as being broken for both potential "Receptors". Some CSMs clearly identify a "Residential Intrusion" receptor, while others use "Residential" only.
7. Table 1: The "Objectives" for OU4-07 need to address the Chemical Washout Area in CFA-07. (as discussed in Section 4.2 of the SOW)
The "Sample Analysis" for PCBs at CFA-10 needs to be revised to reflect the recent decision to use CLP analysis rather than field test kits for this work.

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